

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
ST. JOSEPH DIVISION**

HASSANIN ALY,)	Case No: 5:12-cv-06069
)	
Plaintiff,)	
)	
v.)	MOTION FOR SANCTIONS
)	
HANZADA for IMPORT & EXPORT)	
COMPANY, LTD.,)	
)	
Defendant.)	

Plaintiff, Hassanin Aly, hereby moves for sanctions against Defendant, Hanzada for Import & Export Company, Ltd., pursuant to Rule 37(b)(2) of the Federal Rules of Civil Procedure for the reason that Defendant failed to respond completely to all of Plaintiff's discovery requests on or before August 17, 2015. In support of this motion Plaintiff submits the Affidavit of Nicholas F. Sullivan.

Based on this Court's July 21, 2015 Minute Sheet (Doc. 74) and Order (Doc. 75), along with Defendant's continued pattern of disrespecting court deadlines and abuse of the judicial process, Plaintiff respectfully requests that this Court impose sanctions against Defendant by, without limitation, striking Defendant's First Amended Answer to Complaint (Doc. 57), entering a default judgment against Defendant and in favor of Plaintiff on the issue of Defendant's liability, ordering that Defendant or its attorney pay Plaintiff's reasonable expenses, including attorneys' fees, incurred in filing this motion, and setting a hearing date to determine the amount of Plaintiff's damages or, in the alternative, use the currently scheduled trial date as the hearing date to determine Plaintiff's damages.

WHEREFORE, Plaintiff respectfully requests that this Court enter an Order striking Defendant's First Amended Answer to Complaint (Doc. 57), entering a default judgment in favor

of Plaintiff and against Defendant on this issue of Defendant's liability, ordering that Defendant or its attorney pay Plaintiff's reasonable expenses, including attorneys' fees, incurred in filing this motion, and setting a hearing date to determine the amount of Plaintiff's damages.

Dated this 1st day of September, 2015.

HASSANIN ALY, Plaintiff,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above and foregoing Motion for Sanctions was electronically filed on September 1, 2015, with the Clerk of the Court using the CM/ECF system, which system sent notification of such filing to the following attorneys of record:

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/s/Nicholas F. Sullivan
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